

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MAGTEN ASSET MANAGEMENT
CORPORATION and LAW DEBENTURE
TRUST COMPANY OF NEW YORK,

Plaintiffs,

v.

NORTHWESTERN CORPORATION,

Defendant.

C.A. No. 04-1494-JJF

MAGTEN ASSET MANAGEMENT
CORPORATION,

Plaintiffs,

v.

MIKE J. HANSON and ERNIE J. KINDT

Defendants.

C.A. No. 05-0499-JJF

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

JOSEPH D. PIZZURRO, being duly sworn, deposes and says:

1. I have been admitted pro hac vice to the bar of this Court and am a member of the firm of Curtis, Mallet-Prevost, Colt & Mosle LLP, counsel for defendant NorthWestern Corporation (“NorthWestern”) in the above-referenced action. I submit this affidavit in further Support of NorthWestern Corporation’s Emergency Cross Motion for an Order that the normal briefing schedule under Local Rule 7.1.2 be truncated and that an immediate telephonic hearing be scheduled and an Order that plaintiffs and their counsel

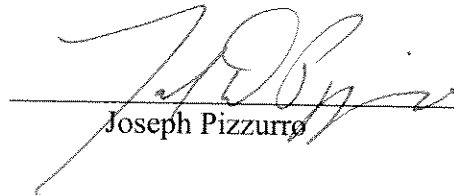
immediately comply with their obligations pursuant to paragraph 8 of the Stipulated Protective Order of March 21, 2007.

2. Attached hereto as Exhibit 1 is a true and correct copy of NorthWestern's supplemental privilege log which was delivered by email on April 5, 2007 and by hand on April 6, 2007 to counsel for Plaintiffs, John Brewer.

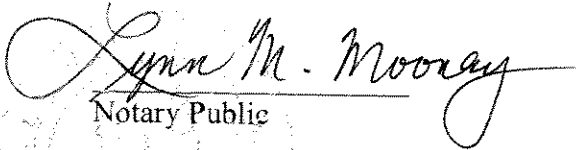
3. Attached hereto as Exhibit 2 is a true and correct copy of NorthWestern's amended supplemental privilege log which was delivered by hand on April 24, 2007 to Mr. Brewer.

4. On April 24, 2007, eleven replacement discs containing NorthWestern's document production, from which all inadvertently produced privileged documents referenced in the April 3, 5, 12 and 16, 2007 demand letters were removed, were delivered by hand to Mr. Brewer.

Dated: April 24, 2007


Joseph Pizzurro

Sworn to before me
this 24th day of April, 2007


Notary Public

LYNN M. MOONEY
Notary Public, State of New York
No. 41-4841073
Qualified in Queens County
Certificate Filed in New York County
Commission Expires June 30, 2007 